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June 14, 2010

**VIA HAND DELIVERY**

CPUC Energy Division  
Attention: Tariff Unit  
505 Van Ness Avenue  
San Francisco, CA 94102

**RE: WMA PROTEST TO:**

Advice No. 4115

(Southern California Gas Company - U 904 G)

Advice No. 3673-E/3119-G

(Pacific Gas and Electric Company - U 39 M)

Advice No. 2475-E

(Southern California Edison Company - U 338 E)

Advice No. 12

(California Center for Sustainable Energy)

Dear Madam or Sir:

The Western Manufactured Housing Community Association (WMA) hereby protests the above-referenced Advice Letters filed on May 24, 2010. The Utilities and the California Center for Sustainable Energy present a proposed California Solar Initiative- Thermal Program Handbook for approval by the Commission. While WMA is certainly supportive of the initiative, WMA submits that by including within the definition of "single family home" the term "mobile homes" results in a very confusing, if not impossible situation, for those mobile homes that are submetered, as opposed to directly metered by the utilities.

On page 15 of the proposed handbook, it states that:

Customers are eligible for one OG-300 incentive per single-family residential dwelling unit. A single-family residential dwelling unit is defined as a group of rooms, such as a house, a flat, an apartment, **or a mobile home** which provides complete single-family living facilities in which the occupant normally cooks meals, eats, sleeps,

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and carries on the household operations incident to domestic life.  
*Italics added.*

Mobile homes are again referenced on page 57 under the definition of Single-Family Residential Dwelling.


Mobile homes that are directly metered by the utilities do not present a problem and certainly should qualify under the program. However, those mobile homes that are located in a submetered park should not qualify for the program. The utilities' serving responsibilities terminate at the master meter, and providing subsidies to those residents beyond the master meter is impossible. The billing and metering is performed by the community owner, not the utility. The incentives contemplated by the program will certainly not reach the residents. While these incentives might be available to the community owner for common area facilities, because the residents are submetered, they would not get the subsidy.

It is also worth noting that the utilities treat mobilehome communities differently for other purposes, such as billing. For example, Southern California Edison considers mobile home communities to be multi-family for billing purposes and in some cases, public program purposes. Therefore, WMA urges the Commission to review the various definitions of single family residences, multi-family residences, and how mobile homes fit within those definitions. Consistency in this area is needed.

For the above reasons, WMA urges the Commission to revise the offered Program Handbook to eliminate the inclusion of submetered mobile home communities.

Very truly yours,

ANDERSON & POOLE

By:   
Edward G. Poole, Attorneys for  
The Western Manufactured Housing  
Community Association

EGP/slf/8868.1000

cc: Brian Cherry, PG&E  
(via U.S. First Class Mail and facsimile)  
Director, CPUC Energy Division  
Jerry Royer, CPUC Energy Division